

DECLARATION OF SUSAN E. COLEMAN

I, SUSAN E. COLEMAN, declare as follows:

1. I am an attorney at law duly authorized to practice before all the courts of the State of California. I am also authorized to practice in United States District Court, Northern District of California. I am a partner in the law firm of Burke, Williams and Sorensen, LLP, attorneys of record herein for defendant THE GEO GROUP, INC., (“defendant”) herein. I am completely familiar with all the files, facts and pleadings in this case, and, if called upon as a witness, I could and would competently testify to the following facts based upon my own personal knowledge or based upon information and belief.

2. I am the attorney responsible for representing defendant THE GEO GROUP, INC. in the above-entitled action now pending in Alameda County Superior Court. I am also responsible for representing this defendant, in this case, if it is allowed to be removed to federal court.

3. Defendant THE GEO GROUP, INC. was served with a copy of the complaint on or about June 28, 2018, at the registered agent of service, Corporate Creations in Boca Raton, Florida, the corporate headquarters and principal place of business of THE GEO GROUP, INC., a Florida Corporation, is in Boca Raton, Florida.

4. Attached hereto and incorporated as Exhibit “A” is a true and correct copy of the summons and complaint filed on June 20, 2018, respectively in Alameda County Superior Court, by plaintiff, naming as a defendant, “THE GEO GROUP, INC., dba GEO CALIFORNIA, INC.,” The complaint alleges state law torts of premises liability and negligence.

5. Attached hereto as Exhibit “B” is a true and correct copy of the Court’s Register of Actions, listing all documents filed in the Superior Court.

6. Attached hereto as Exhibit “C” is a true and correct copy of all documents we received from plaintiff that we are required to attach by applicable

1 law.

2 7. The Summons and Service of Process Notice indicate that THE GEO
3 GROUP, INC., dba GEO CALIFORNIA, INC. was served on June 28, 2018. Thus,
4 this case is being removed within 30 days as required by law.

5 8. The incident alleged in the Complaint occurred in Oakland, California,
6 within Alameda County, in the venue of the Northern District. Plaintiff and his
7 counsel both reside within California, and THE GEO GROUP, INC., is incorporated
8 in and has its principal place of business in Boca Raton, Florida.

9 9. No other defendants are named (other than “Does”) in the Complaint.
10 Thus, there is diversity jurisdiction.

11 10. As noted in the Complaint, plaintiff seeks general and special
12 damages, including medical related expenses, pain and suffering, physical injuries,
13 and related damages, “according to proof,” in addition to costs of suit. Although
14 plaintiff states in his complaint that the amount is “in excess of \$25,000,” defense
15 counsel is informed and believes that this amount was noted only because it is the
16 jurisdictional minimum to file in State Superior Court, and not because it represents
17 the amount actually in controversy in this case.

18 I declare under penalty of perjury under the laws of the United States of
19 America that the foregoing is true and correct.

20 Executed on this 27th day of July, 2018, at Los Angeles, California.

21 /s/ Susan E. Coleman
22 SUSAN E. COLEMAN
23
24
25
26
27
28

EXHIBIT A

SUM-100

SUMMONS (CITACION JUDICIAL)

NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):

THE GEO GROUP, INC. DBA GEO CALIFORNIA, INC. and DOES 1
to 60

YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):

AUNTRELL BROOKS

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

END OF CASE

ALAMEDA COUNTY

JUN 20 2018

CLERK OF THE COURT

BY CURTIS GANTER

Deputy

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a non-profit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees, and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de Ca (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:

(El nombre y dirección de la corte es):

Superior Court of California, County of Alameda - Rene C. Davidson
Courthouse, 1225 Fallon Street, Oakland, CA 94612

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Law Offices of Steers & Associates, 5900 Sepulveda Blvd., Ste. 270, Sherman Oaks, CA 91411

CASE NUMBER:

(Número del caso):

RG18909598

DATE:

(Fecha)

JUN 20 2018

Chad Finke

Clerk, by
(Secretario)

CURTIS GANTER

Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

(SEAL)

NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant

2. ☐ as the person sued under the fictitious name of (specify):

3. ☒ on behalf of (specify): The Geo Group, Inc. DBA
GEO CALIFORNIA, INC.

under: ☐ CCP 416.10 (corporation)

☐ CCP 416.60 (minor)

☐ CCP 416.20 (defunct corporation)

☐ CCP 416.70 (conservatee)

☐ CCP 416.40 (association or partnership)

☐ CCP 416.90 (authorized person)

☐ other (specify):

4. ☒ by personal delivery on (date):

06-28-18

1 Allen Vaysberg, State Bar No. 24
2 LAW OFFICES OF STEERS & ASSOCIATES
3 5900 Sepulveda Blvd., Suite 270
4 Sherman Oaks, California 91411
5 Telephone: (818) 345-9913
6 Facsimile: (818) 343-6103

7 Attorneys for Plaintiff AUNTRELL BROOKS

RECEIVED
JUL 27 2018
ALAMEDA COUNTY

JUN 29 2018

CLERK OF COURT
BY CHRISTYAN GANTER

U.S. Jay

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF ALAMEDA

11 AUNTRELL BROOKS,

12 Plaintiff,

13 vs.

14 THE GEO GROUP, INC. DBA GEO
15 CALIFORNIA, INC. and DOES 1 to 60,

16 Defendants.
17
18

Case No.

RG18909593

COMPLAINT FOR:

1. PREMISES LIABILITY
2. NEGLIGENCE

REQUEST FOR JURY TRIAL

19 Plaintiff AUNTRELL BROOKS (hereinafter "Plaintiff") alleges as follows:
20

21 GENERAL ALLEGATIONS

22 1. The true names and capacities, whether individual, corporate, associate or otherwise, of
23 the Defendants sued herein DOES 1 to 60, and each of them, are unknown to Plaintiff at this time.
24 Plaintiff is informed and believes and based thereon allege that at all times mentioned herein, each
25 Defendant d as a Doe Defendant is or was in some manner responsible for the injuries
26 suffered by Plaintiff as alleged in this Complaint. Plaintiff will ask leave of this Court to amend this
27 Complaint to insert the true names and capacities when same have been ascertained.
28

COMPLAINT

- 1 -

BY FAX

2. Plaintiff is informed and believes and thereon allege that at all times herein mentioned, each of the defendants were the agents, servants or employees of the other defendants, with the permission and consent of each other and in the course and scope of the authority to act for each other, and each has ratified and approved the acts, omissions, representations and activities of each other, and were doing the things herein alleged, while acting within the course and scope of said agency, service or employment.

3. Plaintiff is, and at all times mentioned herein was, an individual residing in the County of Alameda, State of California.

4. Plaintiff is informed and believes and thereon alleges that at all times mentioned herein, Defendant THE GEO GROUP, INC. DBA GEO CALIFORNIA, INC. is a business operating in California. At all times mentioned herein, Defendant THE GEO GROUP, INC. DBA GEO CALIFORNIA, INC. possessed, controlled, managed, operated, and/or maintained its Oakland Center location located at 205 MacArthur Blvd., Oakland, CA 94610 (hereinafter "the Premises").

FIRST CAUSE OF ACTION
(Premises Liability Against All Defendants)

5. Plaintiff refers to and incorporates, as though fully set forth herein paragraphs 1 through 4, inclusive, of this Complaint.

6. On or about June 25, 2016, the herein sued Defendants possessed, controlled, managed, operated, and/or maintained the Premises.

7. On or about June 25, 2016, Plaintiff was lawfully on the Premises.

8. On the aforementioned date and place, Defendants had a duty of care to others, including this Plaintiff, to possess, own, control, manage, operate, keep and/or maintain their Premises safe for entry and/or use by Plaintiff and others like Plaintiff, to give adequate warning of conditions, uses of, structures, or activities on said Premises to persons lawfully on the Premises, including Plaintiff.

9. On the aforementioned date and place, while Plaintiff was lawfully on the Premises, Defendants breached their aforementioned duty of care by negligently, carelessly, wantonly, recklessly and unlawfully maintaining, controlling, managing, supervising, and/or operating the

COMPLAINT

1 Premises by directing, allowing, instructing, ratifying and/or failing to take reasonable steps to
 2 maintain, prevent, warn and/or to correct a dangerous condition on the Premises to make it safe for
 3 Plaintiff and for other persons to use said Premises, so as to allow Plaintiff to fall in an injurious
 4 manner.

5 10. As a direct and proximate cause of all of the foregoing material breaches, acts and
 6 omissions by the Defendants, Plaintiff fell in an injurious manner and has suffered and will
 7 continue to suffer general, special, actual and compensatory damages, including, but not limited to,
 8 his necessary medical and related expenses, as well as mental, emotional and physical pain and
 9 suffering, in an amount presently unknown but exceeding the minimum jurisdictional limit of this
 10 Court and as proven at time of trial.

11
 12 **SECOND CAUSE OF ACTION**
 13 **(Negligence Against All Defendants)**

14 11. Plaintiff refers to and incorporates, as though fully set forth herein, paragraphs 1 through
 15 10, inclusive, of this Complaint.

16 12. On the aforementioned date and place, the herein sued Defendants, and each of them,
 17 whether named or unnamed, had a legal duty of care to Plaintiff to keep the Premises safe for entry
 18 and/or use by Plaintiff, to give adequate warning of hazardous conditions, uses of, structures, or
 19 activities on said Premises to Plaintiff at the time of entry or use of said Premises, and to avoid
 20 causing injury or harm to Plaintiff as herein alleged.

21 13. On the aforementioned date and place, the herein sued Defendants, and each of them,
 22 whether named or unnamed, breached their aforementioned duty of care as set forth above.

23 14. As a direct and proximate cause of all of the foregoing material breaches, acts and
 24 omissions by the herein sued Defendants, and each of them, whether named or unnamed, Plaintiff
 25 fell in an injurious manner, and has suffered and will continue to suffer general and special damages
 26 as set forth above.

27 15. By reason of the foregoing, Defendants are liable for, and Plaintiff is entitled to recover,
 28 his general, special, actual and compensatory damages, inclu but not limited to, his necessary
 medical and related expenses, as well as mental, emotional and physical pain and suffering, in an

COMPLAINT

1 amount presently unknown but exceeding the minimum jurisdictional limit of this Court and as
2 proven at time of trial.

3
4 **REQUEST FOR JURY TRIAL**

5 16. Plaintiff requests a trial by jury.

6
7 **PRAYER FOR RELIEF**

8 **WHEREFORE**, Plaintiff demands judgment against Defendants as follows:

- 9 1. For an award of Plaintiff's general, special, actual and compensatory damages
10 as proven at time of trial;
11 2. For the interest provided by law including, but not limited to, California Civil Code
12 §3291;
13 3. For costs of suit incurred herein; and
14 4. For such other and further relief as the Court may deem just and proper.

15
16 **LAW OFFICES OF STEERS & ASSOCIATES**

17
18 Dated: June 19, 2018

19 By: 

20 Allen Vaysberg
21 Attorneys for Plaintiff AUNTRELL BROOKS
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COMPLAINT

EXHIBIT B

Select Language ▼

THE SUPERIOR COURT OF CALIFORNIA

COUNTY OF ALAMEDA

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Case Details

Case Number: RG18909598**Title:** Brooks VS The Geo Group, Inc.

Case Summary

Register of Action

Participants

Tentative Rulings

Future Hearings

Minutes

Case Number: RG18909598**Title:** Brooks VS The Geo Group, Inc.**Case Type:** Civil**Complaint Type:** Other PI/PD/WD Tort**Case Subtype:** General Civil**Filing Date:** 6/20/2018**Filing Location:** Rene C. Davidson Alameda County Courthouse[Back to Search Results](#)

Select Language ▼

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COUNTY OF ALAMEDA

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Case Summary

Register of Action

Participants

Tentative Rulings

Future Hearings

Minutes

Date	Description	Pages	Price		Select
					<input type="checkbox"/>
6/21/2018	Notice of Assignment of Judge for All Purposes Issued	4	\$4.00	Half Page Preview	<input type="checkbox"/>
6/21/2018	Initial Case Management Conference 11/05/2018 03:00 PM D- 517	2		View	
6/20/2018	Summons on Complaint Issued and Filed	1	\$1.00	Half Page Preview	<input type="checkbox"/>
6/20/2018	Civil Case Cover Sheet Filed for Auntrell Brooks	2	\$2.00	Half Page Preview	<input type="checkbox"/>
6/20/2018	Complaint - Other PI/PD/WD Tort Filed	4	\$4.00	Half Page Preview	<input type="checkbox"/>

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COUNTY OF ALAMEDA

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Case Details

Case Number: RG18909598**Title: Brooks VS The Geo Group, Inc.**

Case Summary

Register of Action

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Tentative Rulings

Future Hearings

Minutes

Party Role**Party Name**

Attorney

VAYSBERG, ALLEN

Defendant

THE GEO GROUP, INC.

Plaintiff

BROOKS, AUNTRELL

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THE SUPERIOR COURT OF CALIFORNIA

COUNTY OF ALAMEDA

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Case Summary

Register of Action

Participants

Tentative Rulings

Future Hearings

Minutes

Date	Location	Action
11/05/2018 15:00:00	Dept 517	Case Management Conference

Page: 1 of 1

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EXHIBIT C



Superior Court of California, County of Alameda Alternative Dispute Resolution (ADR) Information Packet

The person who files a civil lawsuit (plaintiff) must include the ADR Information Packet with the complaint when serving the defendant. Cross complainants must serve the ADR Information Packet on any new parties named to the action.

The Court *strongly encourages* the parties to use some form of ADR before proceeding to trial. You may choose ADR by:

- Indicating your preference on Case Management Form CM-110;
- Filing the Stipulation to ADR and Delay Initial Case Management Conference for 90 Days (a local form included with the information packet); or
- Agree to ADR at your Initial Case Management Conference.

QUESTIONS? Call (510) 891-6055; Email adrprogram@alameda.courts.ca.gov
Or visit the court's website at <http://www.alameda.courts.ca.gov/adr>.

What Are The Advantages Of Using ADR?

- *Faster* – Litigation can take years to complete but ADR usually takes weeks or months.
- *Cheaper* – Parties can save on attorneys' fees and litigation costs.
- *More control and flexibility* – Parties choose the ADR process appropriate for their case.
- *Cooperative and less stressful* – In mediation, parties cooperate to find a mutually agreeable resolution.
- *Preserve Relationships* – A mediator can help you effectively communicate your interests and point of view to the other side. This is an important benefit when you want to preserve a relationship.

What Is The Disadvantage Of Using ADR?

- *You may go to court anyway* – If you cannot resolve your dispute using ADR, you may still have to spend time and money resolving your lawsuit through the courts:

What ADR Options Are Available?

- *Mediation* – A neutral person (mediator) helps the parties communicate, clarify facts, identify legal issues, explore settlement options, and agree on a solution that is acceptable to all sides.
 - Court Mediation Program: Mediators do not charge fees for the first two hours of mediation. If parties need more time, they must pay the mediator's regular fees.

Some mediators ask for a deposit before mediation starts which is subject to a refund for unused time.

- **Private Mediation:** This is mediation where the parties pay the mediator's regular fees and may choose a mediator outside the court's panel.
- **Arbitration** – A neutral person (arbitrator) hears arguments and evidence from each side and then decides the outcome of the dispute. Arbitration is less formal than a trial and the rules of evidence are often relaxed. Arbitration is effective when the parties want someone other than themselves to decide the outcome.
- **Judicial Arbitration Program (non-binding):** The judge can refer a case or the parties can agree to use judicial arbitration. The parties select an arbitrator from a list provided by the court. If the parties cannot agree on an arbitrator, one will be assigned by the court. There is no fee for the arbitrator. The arbitrator must send the decision (award of the arbitrator) to the court. The parties have the right to reject the award and proceed to trial.
- **Private Arbitration (binding and non-binding)** occurs when parties involved in a dispute either agree or are contractually obligated. This option takes place outside of the courts and is normally binding meaning the arbitrator's decision is final.

Mediation Service Programs In Alameda County

Low cost mediation services are available through non-profit community organizations. Trained volunteer mediators provide these services. Contact the following organizations for more information:

SEEDS Community Resolution Center

2530 San Pablo Avenue, Suite A, Berkeley, CA 94702-1612

Telephone: (510) 548-2377 Website: www.seedscrc.org

Their mission is to provide mediation, facilitation, training and education programs in our diverse communities – Services that Encourage Effective Dialogue and Solution-making.

Center for Community Dispute Settlement

291 McLeod Street, Livermore, CA 94550

Telephone: (925) 373-1035 Website: www.trivalleymediation.com

CCDS provides services in the Tri-Valley area for all of Alameda County.

For Victim/Offender Restorative Justice Services

Catholic Charities of the East Bay: Oakland

433 Jefferson Street, Oakland, CA 94607

Telephone: (510) 768-3100 Website: www.cceb.org

Mediation sessions involve the youth, victim, and family members work toward a mutually agreeable restitution agreement.

ALA ADR-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) TELEPHONE NO.: _____ FAX NO. (Optional): _____ E-MAIL ADDRESS (Optional): _____ ATTORNEY FOR (Name): _____	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, ALAMEDA COUNTY STREET ADDRESS: _____ MAILING ADDRESS: _____ CITY AND ZIP CODE: _____ BRANCH NAME: _____	
PLAINTIFF/PETITIONER: DEFENDANT/RESPONDENT:	
STIPULATION TO ATTEND ALTERNATIVE DISPUTE RESOLUTION (ADR) AND DELAY INITIAL CASE MANAGEMENT CONFERENCE FOR 90 DAYS	CASE NUMBER: _____

INSTRUCTIONS: All applicable boxes must be checked, and the specified information must be provided.

This stipulation is effective when:

- All parties have signed and filed this stipulation with the Case Management Conference Statement at least 15 days before the initial case management conference.
- A copy of this stipulation has been received by the ADR Program Administrator, 1225 Fallon Street, Oakland, CA 94612.

1. Date complaint filed: _____. An Initial Case Management Conference is scheduled for:

Date:

Time:

Department:

2. Counsel and all parties certify they have met and conferred and have selected the following ADR process (check one):

- ☐ Court mediation ☐ Judicial arbitration
☐ Private mediation ☐ Private arbitration

3. All parties agree to complete ADR within 90 days and certify that:

- a. No party to the case has requested a complex civil litigation determination hearing;
- b. All parties have been served and intend to submit to the jurisdiction of the court;
- c. All parties have agreed to a specific plan for sufficient discovery to make the ADR process meaningful;
- d. Copies of this stipulation and self-addressed stamped envelopes are provided for returning endorsed filed stamped copies to counsel and all parties;
- e. Case management statements are submitted with this stipulation;
- f. All parties will attend ADR conferences; and,
- g. The court will not allow more than 90 days to complete ADR.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

 (TYPE OR PRINT NAME)

 (SIGNATURE OF PLAINTIFF)

Date:

 (TYPE OR PRINT NAME)

 (SIGNATURE OF ATTORNEY FOR PLAINTIFF)

ALA ADR-001

PLAINTIFF/PETITIONER: DEFENDANT/RESPONDENT:	CASE NUMBER: *
--	----------------

Date:

(TYPE OR PRINT NAME)

▶ _____
(SIGNATURE OF DEFENDANT)

Date:

(TYPE OR PRINT NAME)

▶ _____
(SIGNATURE OF ATTORNEY FOR DEFENDANT)

Superior Court of California, County of Alameda



Notice of Assignment of Judge for All Purposes

Case Number: RG18909598
Case Title: Brooks VS The Geo Group, Inc.
Date of Filing: 06/20/2018

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Rule 3.734 of the California Rules of Court and Title 3 Chapter 2 of the Local Rules of the Superior Court of California, County of Alameda, this action is hereby assigned by the Presiding Judge for all purposes to:

Judge:	Stephen Pulido
Department:	517
Address:	Hayward Hall of Justice 24405 Amador Street Hayward CA 94544
Phone Number:	(510) 690-2726
Fax Number:	
Email Address:	Dept517@alameda.courts.ca.gov

Under direct calendaring, this case is assigned to a single judge for all purposes including trial.

Please note: In this case, any challenge pursuant to Code of Civil Procedure section 170.6 must be exercised within the time period provided by law. (See Code Civ. Proc. §§ 170.6, subd. (a)(2) and 1013.)

NOTICE OF NONAVAILABILITY OF COURT REPORTERS: Effective June 4, 2012, the court will not provide a court reporter for civil law and motion hearings, any other hearing or trial in civil departments, or any afternoon hearing in Department 201 (probate). Parties may arrange and pay for the attendance of a certified shorthand reporter. In limited jurisdiction cases, parties may request electronic recording.

Amended Local Rule 3.95 states: "Except as otherwise required by law, in general civil case and probate departments, the services of an official court reporter are not normally available. For civil trials, each party must serve and file a statement before the trial date indicating whether the party requests the presence of an official court reporter."

IT IS THE DUTY OF EACH PLAINTIFF AND CROSS COMPLAINANT TO SERVE A COPY OF THIS NOTICE IN ACCORDANCE WITH LOCAL RULES.

General Procedures

Following assignment of a civil case to a specific department, all pleadings, papers, forms, documents and writings can be submitted for filing at either Civil Clerk's Office, located at the René C. Davidson Courthouse, Room 109, 1225 Fallon Street, Oakland, California, 94612, and the Hayward Hall of Justice, 24405 Amador Street, Hayward, California, 94544. All documents, with the exception of the original summons and the original civil complaint, shall have clearly typed on the face page of each document, under the case number, the following:

ASSIGNED FOR ALL PURPOSES TO
JUDGE Stephen Pulido
DEPARTMENT 517

All parties are expected to know and comply with the Local Rules of this Court, which are available on the Court's website at: [http://www.alameda.courts.ca.gov/Pages.aspx/Local-Rules\(1\)](http://www.alameda.courts.ca.gov/Pages.aspx/Local-Rules(1)) and with the California Rules of Court, which are available at www.courtinfo.ca.gov.

Parties must meet and confer to discuss the effective use of mediation or other alternative dispute processes (ADR) prior to the initial Case Management Conference. The court encourages parties to file a "Stipulation to Attend ADR and Delay Initial Case Management Conference for 90 Days". Plaintiff received that form in the ADR information package at the time the complaint was filed. The court's Web site also contains this form and other ADR information. If the parties do not stipulate to attend ADR, the parties must be prepared to discuss referral to ADR at the Initial Case Management Conference.

Counsel are expected to be familiar and comply with the Statement of Professionalism and Civility, Alameda County Bar Association at www.acbanet.org.

All references to "counsel" in this Order apply equally to self-represented litigants. The Court maintains Self-Help Services at 24405 Amador Street, Dept. 501, Hayward, CA, (510) 272-1393.

Parties and counsel must submit identical courtesy copies of all law and motion papers directly to Dept. 517 no later than 12:00 p.m. the day after they are filed and served. If the courtroom is closed when the delivery is made, counsel may leave the papers in the box placed outside of Dept. 517. This requirement is set forth in Local Rule 3.30(c). If a party files a motion that requires the Court to review the pleadings, courtesy copies of the relevant Complaints, Cross-Complaints, or Answers must also be delivered to Dept. 517.

Schedule for Department 517

The following scheduling information is subject to change at any time, without notice. Please contact the department at the phone number or email address noted above if you have questions.

- Trials generally are held: Mondays through Thursdays, beginning at 8:30 a.m. and concluding at 1:30 p.m.
- Case Management Conferences are held: Mondays, Tuesdays and Thursdays at 3:00 p.m. Timely filed and complete case management conference statements are mandatory in all cases.
- Law and Motion matters are heard: Tuesdays and Thursdays at 3:00 p.m.

- Settlement Conferences are heard: Friday mornings. The time will be determined by the Court in coordination with the parties.
- Pre-Trial Readiness conferences take place at 1:30 p.m. on Fridays.
- Ex Parte matters are heard: Mondays and Thursdays at 2:30 p.m., as space is available.
- Orders of Examination are heard: Fridays at 9:00 a.m.
- (1) Counsel should consider and recommend creative, efficient approaches to valuing and resolving their case (CRC 3.724). (2) Potential discovery and other problems should be anticipated and discussed. (3) No discovery motion shall be filed without prior serious efforts to resolve it.
- If possible, parties should deliver courtesy copies of papers filed in support and in opposition to ex parte applications no later than 4:00 p.m. on the court date before the hearing on the application. If the parties cannot meet that deadline, they should attempt to deliver the papers to Dept. 517 at least two hours prior to the hearing on the application. The court notes that parties opposing an ex parte application are not required to submit written oppositions prior to the hearing.

Law and Motion Procedures

To obtain a hearing date for a Law and Motion or ex parte matter, parties must contact the department as follows:

- Motion Reservations
Email: Dept517@alameda.courts.ca.gov
- Ex Parte Matters
Email: Dept517@alameda.courts.ca.gov

Tentative Rulings

The court may issue tentative rulings in accordance with the Local Rules. Tentative rulings will become the Court's order unless contested in accordance with the Local Rules.

Tentative rulings will be available at:

- Website: www.alameda.courts.ca.gov/domainweb, Calendar Information for Dept. 517
- Phone: 1-866-223-2244

Dated: 06/21/2018

Gay - S. Court
Facsimile

Presiding Judge,
Superior Court of California, County of Alameda

CLERK'S CERTIFICATE OF MAILING

I certify that the following is true and correct: I am the clerk of the above-named court and not a party to this cause. I served this Notice by placing copies in envelopes addressed as shown on the attached Notice of Initial Case Management Conference and then by sealing and placing them for collection, stamping or metering with prepaid postage, and mailing on the date stated below, in the United States mail at Alameda County, California, following standard court practices.

Executed on 06/22/2018

By *Deanne Oh*^{clerk}

Deputy Clerk

Law Offices of Steers & Associates
 Attn: Vaysberg, Allen
 5900 Sepulveda Blvd.
 Ste. 270
 Sherman Oaks, CA 91411

Superior Court of California, County of Alameda

Brooks

Plaintiff/Petitioner(s)

VS.

The Geo Group, Inc.

Defendant/Respondent(s)

(Abbreviated Title)

No. RG18909598

**NOTICE OF CASE MANAGEMENT
 CONFERENCE AND ORDER**
 Unlimited Jurisdiction

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

Notice is given that a Case Management Conference has been scheduled as follows:

Date: 11/05/2018 Time: 03:00 PM	Department: 517 Location: Hayward Hall of Justice 3rd Floor 24405 Amador Street, Hayward CA 94544 Internet: www.alameda.courts.ca.gov	Judge: Stephen Pulido Clerk: Kasha Clarke Clerk telephone: (510) 690-2726 E-mail: Dept517@alameda.courts.ca.gov Fax:
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ORDERS

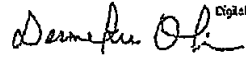
1. Plaintiff must:
 - a. Serve all named defendants and file proofs of service on those defendants with the court within 60 days of the filing of the complaint (Cal. Rules of Court, 3.110(b)); and
 - b. Give notice of this conference to all other parties and file proof of service.
2. Defendant must respond as stated on the summons.
3. All parties who have appeared before the date of the conference must:
 - a. Meet and confer, in person or by telephone as required by Cal. Rules of Court, rule 3.724;
 - b. File and serve a completed *Case Management Statement* on Form CM-110 at least 15 days before the Case Management Conference (Cal. Rules of Court, rule 3.725); and
 - c. Post jury fees as required by Code of Civil Procedure section 631.
4. If you do not follow the orders above, the court may issue an order to show cause why you should not be sanctioned under Cal. Rules of Court, rule 2.30. Sanctions may include monetary sanctions, striking pleadings or dismissal of the action.
5. You are further ordered to appear in person or through your attorney of record at the Case Management Conference noticed above. You must be thoroughly familiar with the case and fully authorized to proceed. You may be able to appear at Case Management Conferences by telephone. Contact CourtCall, an independent vendor, at least three business days before the scheduled conference. Call 1-888-882-6878, or fax a service request to (888) 882-2946. The vendor charges for this service.
6. You may file *Case Management Conference Statements* by E-Delivery. Submit them directly to the E-Delivery Fax Number (510) 267-5732. No fee is charged for this service. For further information, go to www.alameda.courts.ca.gov/ff.
7. The judge may place a *Tentative Case Management Order* in your case's on-line register of actions before the conference. This order may establish a discovery schedule, set a trial date or refer the case to Alternate Dispute Resolution, such as mediation or arbitration. Check the website of each assigned department for procedures regarding tentative case management orders at www.alameda.courts.ca.gov/dc.

CLERK'S CERTIFICATE OF MAILING

I certify that the following is true and correct: I am the clerk of the above-named court and not a party to this cause. I served this Notice of Hearing by placing copies in envelopes addressed as shown hereon and then by sealing and placing them for collection, stamping or metering with prepaid postage, and mailing on the date stated below, in the United States mail at Alameda County, California, following standard court practices.

Executed on 06/22/2018.

By

 Digital

Deputy Clerk